

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

LG. PHILIPS LCD CO., LTD.,

Plaintiff,

V.

TATUNG COMPANY,
TATUNG COMPANY OF AMERICA, INC.,
CHUNGHWA PICTURE TUBES, LTD.,
AND VIEWSONIC CORPORATION,

Defendants.

C.A. No. 05-292 (JJF)

DEFENDANTS' PROPOSED VERDICT FORM

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Attorneys for Defendants/Counterclaimants

Tatung Company, Tatung Company of

America, Chunghwa Picture Tubes, Ltd, and

Viewsonic Corporation

Dated: July 19, 2006

I. INFRINGEMENT

Note:

Question 1 and 2 relate to literal infringement and infringement under the doctrine of equivalents, respectively, of CPT LCD modules using only outer guard rings.

Questions 3 and 4 relate to literal infringement and infringement under the doctrine of equivalents, respectively, of CPT LCD modules using both inner and outer guard rings.

QUESTION 1:

Do you find that LPL has proven by a preponderance of the evidence that CPT's LCD modules using outer guard rings literally infringe the '002 patent? Please answer "Yes" or "No" for each step.

Claim	Element	Is there infringement? (write "Yes" or "No")
1	A method of manufacturing active matrix display backplanes and displays therefrom, comprising:	
	• providing a substrate;	
	• forming a pattern of pixels on said substrate;	
	• forming a plurality of row and column intersecting pixel activation lines, interconnecting substantially all of said row lines to one another and substantially all of said column lines to one another;	
	• forming an outer electrostatic discharge guard ring on said substrate coupled to said interconnected row and column lines via a resistance to provide protection from electrostatic discharges between said row and column activation lines during manufacture of the displays; and	
	• removing said outer guard ring and row and column interconnections prior to completion of the display.	

QUESTION 2:

Do you find that LPL has proven by a preponderance of the evidence that CPT's LCD modules using outer guard rings infringe Claim 1 or Claim 8 under the doctrine of equivalents?

For each claim step listed below, answer whether you find that the methods used to manufacture CPT's LCD modules perform substantially the same function, in substantially the same way to produce substantially the same result.

Claim	Element	Same function (yes or no)	Same way (yes or no)	Same result (yes or no)
1	A method of manufacturing active matrix display backplanes and displays therefrom, comprising:			
	• providing a substrate;			
	• forming a pattern of pixels on said substrate;			
	• forming a plurality of row and column intersecting pixel activation lines, interconnecting substantially all of said row lines to one another and substantially all of said column lines to one another;			
	• forming an outer electrostatic discharge guard ring on said substrate coupled to said interconnected row and column lines via a resistance to provide protection from electrostatic discharges between said row and column activation lines during manufacture of the displays; and			
	• removing said outer guard ring and row and column interconnections prior to completion of the display.			

QUESTION 3:

Do you find that LPL has proven by a preponderance of the evidence that CPT's LCD modules using both inner and outer guard rings literally infringe the '002 patent? Please answer "Yes" or "No" for each step.

Claim	Claims Steps	Is there infringement? (write "Yes" or "No")
1	A method of manufacturing active matrix display backplanes and displays therefrom, comprising:	
	• providing a substrate;	
	• forming a pattern of pixels on said substrate;	
	• forming a plurality of row and column intersecting pixel activation lines, interconnecting substantially all of said row lines to one another and substantially all of said column lines to one another;	
	• forming an outer electrostatic discharge guard ring on said substrate coupled to said interconnected row and column lines via a resistance to provide protection from electrostatic discharges between said row and column activation lines during manufacture of the displays; and	
	• removing said outer guard ring and row and column interconnections prior to completion of the display.	
8	The method as defined in claim 1 including forming an inner electrostatic discharge guard ring on said substrate coupled to said row and column lines via shunt switching elements to provide protection from electrostatic discharges between said row and column activation lines during manufacture of the displays and thereafter.	

QUESTION 4:

Do you find that LPL has proven by a preponderance of the evidence that CPT's LCD modules using both inner and outer guard rings infringe Claim 1 or Claim 8 under the doctrine of equivalents?

For each claim step listed below, answer whether you find that the methods used to manufacture CPT's LCD modules perform substantially the same function, in substantially the same way to produce substantially the same result.

Claim	Element	Same function (yes or no)	Same way (yes or no)	Same result (yes or no)
1	A method of manufacturing active matrix display backplanes and displays therefrom, comprising:			
	• providing a substrate;			
	• forming a pattern of pixels on said substrate;			
	• forming a plurality of row and column intersecting pixel activation lines, interconnecting substantially all of said row lines to one another and substantially all of said column lines to one another;			
	• forming an outer electrostatic discharge guard ring on said substrate coupled to said interconnected row and column lines via a resistance to provide protection from electrostatic discharges between said row and column activation lines during manufacture of the displays; and			
	• removing said outer guard ring and row and column interconnections prior to completion of the display.			
8	The method as defined in claim 1 including forming an inner electrostatic discharge guard ring on said substrate coupled to said row and column lines via shunt switching elements to provide protection from electrostatic discharges between said row and column activation lines during manufacture of the displays and thereafter.			

IF YOU HAVE FOUND INFRINGEMENT FOR EVERY STEP OF ANY CLAIM IN ANY OF QUESTIONS 1 THROUGH 4, THEN PROCEED TO QUESTION NO. 5.

OTHERWISE, PLEASE SKIP TO QUESTION NO. 13

QUESTION 5:

Do you find by a preponderance of the evidence that CPT imports into the United States or offers to sell, sells, or uses within the United States any of the accused CPT LCD Modules made by a process claimed in the '002 patent?

Yes ____ No ____

QUESTION 6:

Do you find by a preponderance of the evidence that CPT has actively induced Tatung Co., Tatung Co. of America, or ViewSonic Corp. to import into the United States or offer to sell, sell, or use within the United States, any of the accused CPT LCD Modules made by a process claimed in the '002 patent?

Yes ____ No ____

QUESTION 7:

Do you find by a preponderance of the evidence that Tatung Co. imports into the United States or offers to sell, sells, or uses within the United States, any of the accused CPT LCD Modules made by a process claimed in the '002 patent?

Yes ____ No ____

QUESTION 8:

Do you find by a preponderance of the evidence that Tatung Co. has actively induced CPT, Tataung Co. of America, or ViewSonic Corp. to import into the United States or offer to sell,

sell, or use within the United States, any of the accused CPT LCD Modules made by a process claimed in the '002 patent?

Yes____ No____

QUESTION 9:

Do you find by a preponderance of the evidence that Tatung Co. of America imports into the United States or offers to sell, sells, or uses within the United States, any of the accused CPT LCD Modules made by a process claimed in the '002 patent?

Yes____ No____

QUESTION 10:

Do you find by a preponderance of the evidence that Tatung Co. of America has actively induced CPT, Tatung, or ViewSonic Corp. to import into the United States or offer to sell, sell, or use within the United States, any of the accused CPT LCD Modules made by a process claimed in the '002 patent?

Yes____ No____

QUESTION 11:

Do you find by a preponderance of the evidence that ViewSonic Corp. imports into the United States or offers to sell, sells, or uses within the United States, any of the accused CPT LCD Modules made by a process claimed in the '002 patent?

Yes____ No____

QUESTION 12:

Do you find by a preponderance of the evidence that ViewSonic Corp. has actively induced CPT, Tatung Co., or Tatung Co. of America to import into the United States or offer to sell, sell, or use within the United States, any of the accused CPT LCD Modules made by a process claimed in the '002 patent?

Yes _____

No _____

PROCEED TO QUESTIONS 13-15.

II. INVALIDITY

QUESTION 13

Do you find that LPL has proven by clear and convincing evidence that Scott Holmberg conceived of the invention claimed in Claim 1 and Claim 8 of the '002 patent prior to the filing date of the patent, July 12, 1988?

Yes____ No____

If yes, what date of conception has LPL proven by clear and convincing evidence?

QUESTION 14:

Have the Defendants proven by clear and convincing evidence that any of the claims of the '002 patent are invalid by anticipation?

Claim 1 Yes____ No____

Claim 8 Yes____ No____

QUESTION 15:

Have the Defendants proven by clear and convincing evidence that any of the claims of the '002 patent are invalid for obviousness?

Claim 1 Yes____ No____

Claim 8 Yes____ No____

IF YOU HAVE FOUND CLAIM 1 OR CLAIM 8 VALID AND INFRINGED,
PROCEED TO QUESTION 16.

OTHERWISE, GO TO QUESTION 19.

III. DAMAGES

QUESTION 16

Pursuant to the court's instruction on actual notice, please mark the date you find that LPL has proven by a preponderance of the evidence that LPL affirmatively provided Defendants with actual notice that they allegedly infringed the '002 patent.

February 8, 2002: Yes___ No___

May 13, 2005: Yes No___

QUESTION 17:

Based on the date selected in QUESTION 16 – without any considerations of willfulness or prejudgment interest, which is a separate issue for the judge – if you find that LPL has proven by a preponderance of the evidence that Defendants infringe a valid claim of the '002 patent, what sum of money would fairly and adequately compensate LPL?

Answer: _____

QUESTION 18:

Do you find that LPL has proven by clear and convincing evidence that any Defendant's infringement of the claims of the patent in suit was willful? Answer "yes" or "no" for each defendant below:

Chunghwa Picture Tubes	Yes___	No___
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Tatung Company	Yes___	No___
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Tatung Co. of America	Yes___	No___
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ViewSonic Corporation	Yes___	No___
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IV. EXCEPTIONAL CASE

QUESTION 19:

If you have found that there is no infringement of any valid claim, is this an exceptional case that merits awarding the Defendants their attorneys' fees?

Answer: _____

THE JURY FOREPERSON SHOULD THEN SIGN AND DATE THE VERDICT FORM AND RETURN IT TO THE SECURITY OFFICER.

Signed this ____ day of July, 2006

Jury Foreperson

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

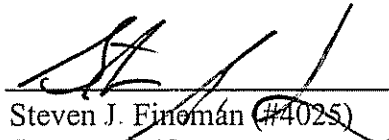
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 19, 2006, I electronically filed the foregoing document with the Clerk of Court using CM/ECF, which will send notification of such filing to, and also hand delivered same to:

Richard D. Kirk, Esquire
The Bayard Firm
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I HEREBY CERTIFY that on July 19, 2006, I sent the foregoing document by Electronic Mail to the following non-registered participants:

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